

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

|                        |   |                             |
|------------------------|---|-----------------------------|
| _____                  | ) |                             |
| JOHN DOE,              | ) |                             |
|                        | ) |                             |
| Plaintiff,             | ) |                             |
|                        | ) | Case No.: 4:19-cv-00300-JMB |
| v.                     | ) |                             |
|                        | ) |                             |
| WASHINGTON UNIVERSITY, | ) |                             |
|                        | ) |                             |
| Defendant.             | ) |                             |
| _____                  | ) |                             |

**PLAINTIFF'S SUPPLEMENTAL TABLE OF AUTHORITIES**

NOW COMES the Plaintiff, by and thru his attorneys, and, in addition to the cases and authorities cited before, Plaintiff hereby submits the following supplemental authorities cited by Plaintiff's counsel at oral arguments:

**NEGLIGENCE**

- *Restatement (Second) of Torts § 321 (1965)* - (used to find duty in Minnesota cases), attached as **EXHIBIT A**.
- State of Missouri's appellate brief in *State of Missouri v. Linda Gargus*, SC93937, filed May 1, 2014, attached as **EXHIBIT B**.
- *Restatement (Second) of Torts § 324A (1965)*, attached as **EXHIBIT C**.

**PROMISSORY ESTOPPEL**

- *Robbe v. Webster University* - 98 F. Supp. 3d. 1030 (E.D. Mo. 2015), attached as **EXHIBIT D**.

Respectfully submitted,

BY: JOHN G. COVERT - 6285969IL

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